From: Wilson, Linda J (Whiting)

To: <u>Caudill, Motria</u>

Subject: RE: Update on NEMC slides and benzene data follow-up

Date: Tuesday, August 18, 2015 8:19:22 AM
Attachments: EPA Study -BP Whiting- Letter.pdf

Motria:

Thank you for sharing the final presentation with us. We haven't come up with a definitive reason for the differences between 1&4 and 2&3. The attached information was prepared by our contractor using just the data from the presentation, so it was a limited analysis. There are a number of factors that could influence the difference, including the time on-line. Let me know if this helps, or if you would like to work with our contractor to do a deeper analysis.

I have no information on the temporal shift. That was an observation based on the presentation.

Thanks

Linda Wilson

Environmental Manager Whiting Business Unit Office: 219-473-3287 Cell: 219-545-5403

This e-mail may contain confidential or proprietary information belonging to the BP group and is intended only for the use of the recipients named above. If you are not the intended recipient, please immediately notify the sender and either delete this email or return to the sender immediately. You may not review, copy or distribute this email. Within the bounds of law, this part of BP retains all emails and IMs and may monitor them to ensure compliance with BP's internal policies and for other legitimate business purposes.

From: Caudill, Motria [mailto:caudill.motria@epa.gov]

Sent: Thursday, July 23, 2015 11:23 AM

To: Wilson, Linda J (Whiting)

Subject: Update on NEMC slides and benzene data follow-up

Hi Linda – Thank you for your timely input on the presentation. In case Wayne didn't send you the final, see attached. He made your suggested change and added two slides to summarize the duplicate sample results for canisters and tubes, FYI.

I wanted to let you know that, when calculating the 1-week averages using BP's data, I did not substitute zero (or anything else) for the hours of calibration/maintenance. The end result is that our passive methods had a weeklong sample of about 168 hours, whereas the BP results were an average of ~126 hours. This is in line with the 75% completeness requirement that we have for NAAQS pollutants, so it's not any kind of an issue.

Can you tell me what you mean about a temporal shift in week 6? I should fix any error you might have found or suspect.

I was hoping to draft a journal article and would like to include your benzene data. Have you had any luck figuring out why the four autoGC stations differ from each other? Sites #2-3 compare well with our passives, but at #1 and 4 your results are notably higher.

~~~~~~~~~~~~~~~~~

Motria P. Caudill, Ph.D.
Air Monitoring & Analysis Section
USEPA Region 5 (AT-18J)
77 W. Jackson Blvd.
Chicago, IL 60604
telephone (312) 886-0267
direct fax (312) 582-5863

From: Wilson, Linda J (Whiting) [mailto:linda.wilson2@bp.com]

**Sent:** Tuesday, July 07, 2015 7:18 AM **To:** Whipple, Wayne; Caudill, Motria **Subject:** RE: Slides for NEMC conference

Thank you for the opportunity to review this presentation. Our main comment on the presentation is that slide 12 states that the 1-hour GC data includes "25% missing data". The implication seems to be that 25% of the data set is invalid measurement attempts, when the components of the 25% are mostly periods of calibration events specified as part of the analysis method, as well as a relatively small number of hours of truly invalid data due to malfunctions, power interruptions, etc. I would not characterize the period as "missing" since most of it was not planned for attempting ambient measurements. I recommend that the description be modified to say "25% calibration and maintenance events/ invalid data" to better characterize it and not imply that we may be close to not meeting the CD requirements.

• This also highlights an issue for evaluation, and that is whether EPA counted those hours where a GC result was not available as zero, or some other value in calculating a weeks-long average concentration to compare to the passive samples.

The rest is really more about observations when we reviewed the charts.

- It appears that either the tubes systematically overstate or canisters systematically understate concentrations.
- There appears to be some kind of temporal shift in week 6.

From: Caudill, Motria [mailto:caudill.motria@epa.gov]

**Sent:** Wednesday, July 01, 2015 2:06 PM

**To:** Wilson, Linda J (Whiting)

Cc: Whipple, Wayne

Subject: Slides for NEMC conference

Hi Linda – Per our phone conversation, presentation slides are attached. Please let me know (and copy Wayne Whipple) if you have any edits. I'll send you a separate email about the possible

benzene data issue; we can talk more about that after the conference. For now, it's good for us to focus on the canister vs. tube comparison and acknowledge BP's support in making this project possible.

Here is the link for the National Environmental Monitoring Conference (NEMC), which is July 13-17: <a href="http://www.nemc.us/">http://www.nemc.us/</a>

Below I've copied the abstract as it appears on the website.

# Next Generation Ambient Air Monitoring for Benzene and Toluene Compared with Traditional Methods at the Fenceline of an Indiana Oil Refinery

Oral Presentation

## Prepared by W. Whipple<sup>1</sup>, M. Caudill<sup>2</sup>

- 1 USEPA Region 5, 536 S Clark Street, Chicago, IL, 60626, United States
- 2 USEPA Region 5, 77 West Jackson Boulevard (AT-18J), Chicago, IL, 60604,

Contact Information: whipple.wayne@epa.gov; 312-353-9063

### **ABSTRACT**

This study is part of a broader evaluation of a low-cost passive VOC sorbent tube sampler which was developed by EPA Office of Research and Development (ORD). This investigation was managed by EPA Region 5 in Chicago with sampling conducted on the basis of a fenceline air monitoring network at the BP Refinery in Whiting, Indiana. BP operates four stations which measure VOCs via continuous gas chromatograph as well as open path transceivers. EPA received permission to collocate passive sorbent tubes and canisters at these stations for weekly sampling between August and October 2014. Thirty complete sets of paired samples were collected, with sorbent tubes analyzed by EPA-ORD and canisters analyzed at EPA Chicago Regional Laboratory (CRL). BP Refinery, EPA-ORD, and EPA-CRL each reported a different list of VOC compounds, ranging in number from four species at BP to 60 at EPA-CRL. All organizations reported benzene and toluene, thus allowing a four-way method comparison for these hazardous air pollutants. EPA scientists made a quantitative and qualitative assessment of the four analytical methods and made recommendations on their appropriate uses in future fenceline and community-based air monitoring studies.

Motria P. Caudill, Ph.D. Air Monitoring & Analysis Section USEPA Region 5 (AT-18J) 77 W. Jackson Blvd. Chicago, IL 60604 telephone (312) 886-0267 direct fax (312) 582-5863